

EXHIBIT 6

REPORTED BY: KORTNEY V. HOUTS, CSR

Page 26

1 STEM. And I was in a calculus class in Tuttle,
 2 Oklahoma, working with students there.
 3 Q She's actually from Tuttle.
 4 THE WITNESS: Are you from Tuttle?
 5 THE COURT REPORTER: I am.
 6 THE WITNESS: Yes. Did you take calculus?
 7 THE COURT REPORTER: No.
 8 THE WITNESS: No.
 9 Q (By Mr. Engel) What is STEM?
 10 A STEM is an acronym -- an acronym for Science
 11 Technology Engineering and Math. And the National
 12 Science Foundation is worried that not enough students
 13 are studying those topics.
 14 Q I didn't write this question down. But it
 15 just hit me that Rimkus reached out to you when they
 16 were looking for an engineer. Is that correct?
 17 A Correct.
 18 Q You weren't looking for this -- is this a
 19 part-time job for you?
 20 A It's full-time now.
 21 Q Okay. So you're full-time working for
 22 Rimkus?
 23 A Yes.
 24 Q Okay. But Rimkus reached out to you?
 25 A They did.

Page 27

1 Q How did that happen?
 2 A I don't know. They sent me an e-mail. And I
 3 was ready to leave the university, and I thought, well,
 4 that sounds interesting. Yeah. I don't know how they
 5 found me.
 6 Q Your dissertation?
 7 A I don't know.
 8 Q So when you graduate in 2009 with your Ph.D.,
 9 what are you doing from then on?
 10 A I was a professor.
 11 Q So full-time professor?
 12 A (Witness nods head affirmatively.)
 13 Q Until --
 14 MR. FELTY: You've got to answer audibly.
 15 THE WITNESS: Oh, sorry. Yes. Sorry.
 16 Q (By Mr. Engel) Until --
 17 A I'm still -- until May 15th of this year.
 18 Q Okay. And then did you have any other
 19 engineering jobs besides the Rimkus job between those
 20 times?
 21 A No.
 22 Q Okay. And when did you start working for
 23 Rimkus?
 24 A August.
 25 Q Of --

Page 28

1 A Of 2017, this past August.
 2 Q I was thinking about when my report was from
 3 A Okay.
 4 Q Okay.
 5 A It might have been late July, but I'm
 6 thinking August.
 7 Q Okay. When you go to work for Rimkus, did
 8 they have any formal training?
 9 A Yes.
 10 Q Tell me about that.
 11 A It was a lot about their computer systems and
 12 how to log your time and how to log your hours and --
 13 Q The software that they use?
 14 A Yes. It was a lot about how to write
 15 reports, the formats.
 16 Q Is that a -- is that a PowerPoint slide or,
 17 like, a prerecorded show you're watching or movie?
 18 Video, I guess, is --
 19 MR. FELTY: Object to the form.
 20 Q (By Mr. Engel) -- what people call it now.
 21 A It was some of both. So they had little
 22 videos about how to -- how to go and investigate and
 23 get all of the information. So they had training
 24 videos, and then they also had booklets that you could
 25 read. And then we had a meeting with the -- with the

Page 29

1 office manager.
 2 Q What are the topics of the training videos?
 3 A I mean, it was everything from HR, you know,
 4 all the corporate typical training. And then I believe
 5 there was some about, you know, working with customers
 6 and being professional and all that kind of stuff that
 7 you shouldn't have to tell people, but you do.
 8 Q Of course. What about -- and some of that's
 9 about writing the reports. Correct?
 10 A Correct.
 11 Q What's the name of the software they use to
 12 write their reports?
 13 A Microsoft Word.
 14 Q Advanced.
 15 A It comes in a Word.
 16 Q What about -- were there videos specific to
 17 forensic engineering?
 18 A There was. There weren't about buildings.
 19 But, for instance, the one that I saw about forensics
 20 was about investigating a car crash.
 21 Q Were there any other ones that you watched
 22 when you were getting the job at Rimkus?
 23 A Any other what?
 24 Q Videos -- training videos about forensic
 25 engineering.

<p style="text-align: right;">Page 78</p> <p>1 Q Earthquake?</p> <p>2 A No.</p> <p>3 Q What kind of claim was it?</p> <p>4 A It was a tree fell on it.</p> <p>5 Q Did they hire engineers on that claim?</p> <p>6 A They didn't.</p> <p>7 Q Was it CSAA?</p> <p>8 A It was not.</p> <p>9 Q Moving on. Now that you're doing this</p> <p>10 forensic engineering, do you understand the importance</p> <p>11 of the reports that you're writing?</p> <p>12 A I understand -- yes. I understand the</p> <p>13 importance of all of my engineering work.</p> <p>14 Q Well, specific to Rimkus, ma'am.</p> <p>15 A Specific -- every -- engineering has a great</p> <p>16 deal of responsibility, and I realize that.</p> <p>17 Q And you understand that your determinations</p> <p>18 on cause of loss dictate coverage. Correct?</p> <p>19 MR. FELTY: Object to form.</p> <p>20 THE WITNESS: I focus on the engineering.</p> <p>21 Q (By Mr. Engel) But isn't it your</p> <p>22 understanding that the insurance companies are hiring</p> <p>23 you to determine the cause of loss and some of those</p> <p>24 causes of loss are covered causes of loss and some of</p> <p>25 those are not covered causes of loss?</p>	<p style="text-align: right;">Page 80</p> <p>1 A I don't go there. That's not part of my job.</p> <p>2 Q Okay. So you're going to say you don't -- if</p> <p>3 I was to tell you that your cause of loss</p> <p>4 determinations are what they're using to dictate</p> <p>5 coverage, that would be something that you are</p> <p>6 unfamiliar with?</p> <p>7 A The specifics of, yes. I'm not familiar with</p> <p>8 that.</p> <p>9 Q Right. So you're going to say that you don't</p> <p>10 know whether or not settling or improper construction</p> <p>11 is covered. Correct?</p> <p>12 A Correct.</p> <p>13 Q And you're going to stay out of all of</p> <p>14 these -- my pages of insurance questions where I'm</p> <p>15 asking you about insurance coverage, you don't</p> <p>16 understand any of that?</p> <p>17 A I don't even want to know about it.</p> <p>18 Q Fair enough. But as far as what you're being</p> <p>19 hired to do, the determination of cause of loss is</p> <p>20 something that dictates coverage.</p> <p>21 MR. FELTY: Object to form. Asked and --</p> <p>22 Q (By Mr. Engel) Is that your understanding?</p> <p>23 MR. FELTY: Asked and answered.</p> <p>24 You can answer again.</p> <p>25 THE WITNESS: Okay. Do I answer again?</p>
<p style="text-align: right;">Page 79</p> <p>1 A I focus strictly on the engineering.</p> <p>2 Q I know. But are you going to say that you</p> <p>3 don't have an understanding that that's why they hired</p> <p>4 an engineer?</p> <p>5 A I do. But I really focus on the engineering.</p> <p>6 Q Sure. And you focus on, you know, whatever</p> <p>7 they've assigned you to do in your engineering. But</p> <p>8 it's your understanding that Rimkus is hired because</p> <p>9 they want -- the insurance carriers or your clients --</p> <p>10 A Want our engineering opinion.</p> <p>11 Q As to what the cause of loss is because --</p> <p>12 A As to what -- yes.</p> <p>13 Q -- because the cause of loss can dictate the</p> <p>14 insurance coverage. Correct?</p> <p>15 A I'm going to take your word for it.</p> <p>16 Q Well, that's what I'm asking you. Like, you</p> <p>17 don't have a feel for that at all?</p> <p>18 A I really don't.</p> <p>19 Q And so do you think that Rimkus is just hired</p> <p>20 by insurance companies so they can get your engineering</p> <p>21 opinion, or what do you think the purpose is behind it?</p> <p>22 A Yes. And then they -- I realize they make</p> <p>23 decisions based on our engineering opinions.</p> <p>24 Q And what are those decisions? What do you</p> <p>25 think those decisions are?</p>	<p style="text-align: right;">Page 81</p> <p>1 MR. FELTY: Same answer --</p> <p>2 THE WITNESS: I understand decisions are made</p> <p>3 on my engineering decisions, on my engineering</p> <p>4 opinions.</p> <p>5 Q (By Mr. Engel) And so you take that very</p> <p>6 seriously, wouldn't you?</p> <p>7 A I take everything I do very seriously.</p> <p>8 Q Some of these are multimillion-dollar losses</p> <p>9 where people have damage to their structures, and your</p> <p>10 determination can dictate whether or not their</p> <p>11 insurance company pays them?</p> <p>12 MR. FELTY: Object to form.</p> <p>13 MR. ANDREWS: Object to the form.</p> <p>14 Q (By Mr. Engel) You may answer.</p> <p>15 A Correct. Engineering has -- has a lot of</p> <p>16 responsibilities. When I was a design engineer, it was</p> <p>17 safety. It's people's lives. I take my engineering</p> <p>18 responsibilities very seriously.</p> <p>19 Q But now it's insurance claims?</p> <p>20 A Now it's --</p> <p>21 MR. FELTY: Object to form.</p> <p>22 THE WITNESS: Now it's engineering opinions.</p> <p>23 Q (By Mr. Engel) Would you say that all of</p> <p>24 your inspections at Rimkus have to do with insurance</p> <p>25 claims whether you are hired by an insurance company or</p>

Page 242

1 A Not from me, they don't.
 2 Q Is there anything else I need to know about
 3 your involvement in this investigation or claim?
 4 A I can't think of anything.
 5 MR. ENGEL: Let me look at my notes off the
 6 record for a little bit and take a little bit of a
 7 break.
 8 MR. FELTY: Yeah. Take five.
 9 (A break was taken.)
 10 MR. FELTY: Back on the record.
 11 Q (By Mr. Engel) Ms. Doc Holliday, you're back
 12 on the record, ma'am.
 13 A Okay.
 14 Q One of the things that you say in your report
 15 is that things are out of plumb. Did you take any
 16 measurements of this out of plumb?
 17 A Not numeric measurements. Just with a level.
 18 Q And that's a four-foot level?
 19 A Yes.
 20 Q What areas did you measure?
 21 A We measured the floors and the walls.
 22 Q Okay. Which walls?
 23 A Outsides of the walls.
 24 Q All four sides of the residence on the
 25 outside?

Page 243

1 A Probably.
 2 Q Okay.
 3 A Tim had the level.
 4 Q Did you do those measurements or did Tim?
 5 A Tim did.
 6 Q So you're leaving OU now?
 7 A I am.
 8 Q And you're moving to a full-time position at
 9 Rimkus?
 10 A I am.
 11 Q When you were going to get your Ph.D. -- and
 12 it sounds like specializing in earthquake structure
 13 design, if you will. Right?
 14 A Right.
 15 Q What were you planning on doing with that
 16 specialty?
 17 A I did not have a plan.
 18 Q Did you have any idea of what you were going
 19 to be?
 20 A I thought I'd be a professor for the rest of
 21 my life.
 22 Q When did that shift?
 23 A You know, I got -- I just -- right before I
 24 went to work with Rimkus, I looked at -- I had gotten
 25 tenure and everything was going well, and I looked at

Page 244

1 professors that were -- had been around for longer than
 2 I had, and they didn't seem all that happy. And so I
 3 decided to make a change, do something different, shake
 4 it up a little bit.
 5 Q Now, is that before or --
 6 A That was an earthquake joke.
 7 Q That was good.
 8 MR. ANDREWS: That was on the record. That
 9 was a good one.
 10 THE WITNESS: Yes.
 11 Q (By Mr. Engel) Is that -- was that before or
 12 after Rimkus -- did you -- had you made this decision
 13 before or after Rimkus had reached out?
 14 A I was -- about the same time. The timing was
 15 right.
 16 Q Does the Rimkus gig pay more?
 17 A Oh, yes. I mean, the teachers are on strike.
 18 Q I understand.
 19 A We don't value education in this state.
 20 Q Is the Rimkus thing -- is that a -- is that a
 21 stepping stone to something else that you have in mind
 22 or is that like a full-time, this is where I'm going to
 23 be for the next 15 years, kind of thing?
 24 A I don't -- I don't know. I'm not sure. It's
 25 not -- I don't have a -- I don't have another job in

Page 245

1 mind or another plan.
 2 Q And you've been with them for less than a
 3 year?
 4 A Less than a year.
 5 Q And you understand that the majority of your
 6 work is going to be writing reports for insurance
 7 companies. Right?
 8 MR. FELTY: Object to the form.
 9 Argumentative.
 10 MR. ANDREWS: Same objection.
 11 THE WITNESS: There's a lot of report
 12 writing, and nobody becomes an engineer because they
 13 like to write.
 14 Q (By Mr. Engel) But a lot of these reports
 15 you're going to be writing, they're for insurance
 16 companies. Right?
 17 MR. FELTY: Same objection.
 18 THE WITNESS: It seems so.
 19 Q (By Mr. Engel) Rimkus is going to be
 20 utilized by insurance companies to possibly deny
 21 coverage to the people of Oklahoma through your
 22 determinations of cause of damage.
 23 MR. ANDREWS: Object to the form.
 24 Q (By Mr. Engel) Is that something that you're
 25 comfortable with?

Page 246

1 A I'm comfortable making engineering decisions,
2 and if that leads to policy decisions, I'm sorry if it
3 doesn't go the way people want. But I'm going to do my
4 fair engineering assessment.

5 Q Do you find job satisfaction in what you do
6 for Rimkus?

7 A I do.

8 Q Have you understood all the questions I've
9 asked you today?

10 A I have.

11 Q Was I fair and polite to you?

12 A And -- you were. And the questions I didn't
13 understand, we clarified at the time. So we have no
14 outstanding miscommunications.

15 Q I appreciate you, ma'am. Thank you very
16 much.

17 A Thank you.

18 MR. ANDREWS: Would you grade him about a B?

19 THE WITNESS: Oh, let's give him an A. Come
20 on. Let's give him an A.

21 MR. ANDREWS: I have no questions.

22 MR. ENGEL: That's okay. Back in my law
23 firm, they always give me Ds.

24 THE WITNESS: No, they don't.

25 MR. FELTY: One thing we wanted to -- we're

Page 248

1 the gist of my disagreement.

2 MR. FELTY: Yeah. So we'll brief the issue
3 for the Court. We would move for protective order that
4 any testimony elicited from Dr. Holliday be sealed
5 unless and until the Court rules on this issue and not
6 to be used for any other purpose over and beyond the
7 Smith versus CSAA case. Again, we'll just let that --
8 have to let the Court decide.

9 Dr. Holliday, you now have to say whether
10 you're going to read and sign your deposition or waive
11 it. My recommendation to you is to say, read and sign.

12 THE WITNESS: Okay. Read and sign.

13 MR. FELTY: All right. We're done.

14 (Deposition concluded at 3:48 p.m.)

15 (Total time on the record, 4 hours, 16 minutes)

Page 247

1 going to move to seal Dr. Holliday's deposition to the
2 extent any testimony elicited from Dr. Holliday
3 pertaining to matters, one, outside the state of
4 Oklahoma; two, not involving an allegation of damage to
5 a residential structure involving seismicity; or,
6 three, training or associated questions concerning
7 non-seismicity issues.

8 Unless and until we have an opportunity to
9 review the transcript, we won't know the page and line
10 of the testimony we'd like to seal. So we'll need to
11 wait until the transcript is available. But we would,
12 again, move to seal that part -- or those parts of her
13 deposition transcript.

14 MR. ANDREWS: No objection.

15 MR. ENGEL: I'm going to object. Her --
16 strictly on the basis that when she came in to Rimkus,
17 there's very little training provided. All of my
18 questions pertaining to her training at Rimkus and the
19 materials she received has to do with her experience as
20 a forensic engineer. And not only that, but now she's
21 a full-time forensic engineer for a company called
22 Rimkus. Rimkus, as demonstrated in her testimony,
23 doesn't provide any training to their engineers in
24 regards to being a forensic engineer. It sounds like
25 something that we'll be briefing later on, but that's